Christopher Antonacci

Direct Dial: 212.906.4698 christopher.antonacci@lw.com

LATHAM & WATKINS LLP

August 19, 2019

VIA U.S. MAIL

National FOIA Office United States Environmental Protection Agency 1200 Pennsylvania Avenue, NW, Room 5315 Washington, DC 20460 53rd at Third 885 Third Avenue

New York, New York 10022-4834

Tel: +1.212.906.1200 Fax: +1.212.751.4864

www.lw.com

FIRM / AFFILIATE OFFICES

Beijing Moscow
Boston Munich
Brussels New York
Century City Orange County

Paris Chicago Dubai Riyadh Düsseldorf San Diego Frankfurt San Francisco Hamburg Seoul Shanghai Hong Kong Houston Silicon Valley London Singapore Los Angeles Tokyo

Madrid

d Washington, D.C.

Milan

Re: Freedom of Information Act Request

PROTECO Site - Road 385, Km 4.4, Bo. Tallaboa, Peñuelas, Puerto Rico

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. §§ 552 et seq., and regulations thereunder, I hereby request the following documents be made available for inspection and copying:

- 1. Any and all draft and final documents of any kind, including but not limited to, correspondence (both emails and letters), reports, agreements, consent decrees, summaries, evidence packages, environmental data, enforcement documents, certifications, approvals, notice letters, notices of violation, information requests, responses to information requests, hazardous waste manifests, permits, or any other document relating to the environmental conditions at, ownership of, operation of, and/or disposal of hazardous substances at the PROTECO Site, EPA ID PRD000831487, located at Road 385, Km 4.4, Bo. Tallaboa, Peñuelas, Puerto Rico.
- 2. Any and all draft and final documents of any kind, including but not limited to, correspondence (both emails and letters), reports, agreements, consent decrees, summaries, evidence packages, environmental data, enforcement documents, certifications, approvals, notice letters, notices of violation, information requests, responses to information requests, hazardous waste manifests, permits, or any other document relating to the environmental conditions at, ownership of, and/or operation of the Owens-Illinois de Puerto Rico, LLC ("OIPR") facility located at Road 690 Km 1.1 in Vega Alta, Puerto Rico, 00762.

This firm agrees to pay any reasonable fees and costs incurred for locating documents for review, in addition to any subsequent costs for duplication. However, before copying the

LATHAM & WATKINS LLP

requested documents, please let me know if the documents can be made available for inspection and kindly provide me with an estimate as to the volume of the documents to be copied.

If you have any questions regarding this request, please do not hesitate to contact me at (212) 906-4698.

Christopher Antonacci of LATHAM & WATKINS LLP